

United States District Court
District of Massachusetts

DOUGLAS C.GREER,

PLAINTIFF,

v.

**CITY OF SPRINGFIELD, JEFFREY M.
ASHER, JAMES F KERVICK, JAMES L.
SHEWCHUCK, JAMES M. MORIARTY,
JOHN DOES Nos. 1-4, JOHN DOE, No. 5,
and PAULA MEARA, CHIEF OF POLICE,**
DEFENDANTS.

CIVIL ACTION NO. 05-30001-MAP

PLAINTIFF'S ASSENTED TO MOTION TO EXTEND TIME FOR DISCOVERY

Now comes the Plaintiff, Douglas C. Greer, and moves this Honorable court to extend time to conduct discovery for forty-five (45) days from August 4, 2006 up to and including September 18, 2006.

As grounds therefore, the Plaintiff states that counsel for Plaintiff, Joseph L. Edwards, suddenly and unexpectedly lost his mother on July 24, 2006. Due to this unfortunate event, the following scheduled depositions will have to be rescheduled:

July 24, 2006:	Keeper of Records deposition American Medical Response
July 27, 2006:	Deposition of James Kervick
July 28, 2006:	Deposition of Paula Meara
August 1, 2006:	Deposition of Douglas Greer
August 2, 2006:	Deposition of Jeffrey Asher
August 4, 2006:	Deposition of Kathryn P. O'Connor

In addition, the parties actively engaged in attempts to settle this matter and are in the process of selecting a mediator.

WHEREFORE the Plaintiff requests an extension on the time for discovery through September 18, 2006.

This motion has been assented to by all counsel.

**THE PLAINTIFF
DOUGLAS C. GREER
By his Attorney**

/s/ Joseph L. Edwards, Jr., Esq.

Joseph L Edwards, Jr., Esq.
Prince, Lobel, Glovsky & Tye LLP
100 Cambridge St., Suite 2200
Boston, MA 02114
Telephone 617-456-8000
Telefax 617-456-8100
BBO # 564228

**ASSENTED TO BY
THE DEFENDANTS
CITY OF SPRINGFIELD
And PAULA MEARA
By their Attorney**

/s/ Michael M. Mulcahy, Esq.

Michael M. Mulcahy, Esq.
City of Springfield Law Department
36 Court Street, Room 210
Springfield, MA 01103
Telephone 413-787-6085
Telefax, 413-787-6173
BBO # 561824

**ASSENTED TO BY
THE DEFENDANTS
JEFFREY M. ASHER,
JAMES F KERVICK,
JAMES L. SHEWCHUCK,
JAMES M. MORIARTY,
By their Attorney**

/s/ Kevin Coyle, Esq.

Kevin Coyle, Esq.
Coyle, Dunbar, Geoffrion & Ward
935 Main Street
Springfield, MA 01103
Telephone 413-787-1524
Telefax 413-787-1703
BBO # 103540

Dated: July 26, 2006